

EXHIBIT “A”

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**PATRICIA ROBERTS,
INDIVIDUALLY,
AND AS ADMINISTRATOR OF
THE ESTATE OF FRED JENKINS,
DECEASED,**

Plaintiff,

v.

**THE TRAVELERS INDEMNITY
COMPANY, THE TRAVELERS
COMPANIES, INC., JANE DOE, JOHN
DOE, ABC CORP., and XYZ CORP.,**

Defendants.

**CIVIL ACTION
FILE NO.:**

AFFIDAVIT OF ANDREW T. CRAFT, ESQUIRE

STATE OF GEORGIA
COUNTY OF FULTON

Before me, the undersigned officer, duly authorized to administer oaths,
personally appeared, Andrew T. Craft, Esquire, who being duly sworn according to
law did depose and state:

I, Andrew T. Craft, Esquire, am over the age of eighteen, have personal knowledge of the facts and matters set forth herein, and am competent to testify as to the facts and matters set forth herein.

The undersigned is counsel for Defendants The Travelers Indemnity Company and The Travelers Companies, Inc. (“Defendants”) in the above-captioned action.

This is a civil action arising from an alleged slip-and-fall that occurred on Defendants’ property. (See Complaint ¶ 20, attached within composite as Exhibit B.)

This action was commenced in the State Court of Gwinnett County, Georgia on December 16, 2022. Defendant The Travelers Indemnity Company was served on December 28, 2022 and Defendant The Travelers Companies, Inc. was served on January 6, 2023.

Based upon the nature and severity of allegations within Plaintiffs’ Complaint and Plaintiffs’ \$197,500.00 pre-suit demand, Defendants aver in good-faith that Plaintiffs seek to recover damages in excess of \$75,000.00. (See Complaint ¶ 21, attached within composite as Exhibit B.)

At all times material to this action, Defendant The Travelers Indemnity Company was a foreign corporation incorporated in the State of Connecticut and

having its principal place of business in Hartford, Connecticut. At all times material to this action, Defendant The Travelers Companies, Inc. was a foreign corporation incorporated in the State of Minnesota and having its principal place of business in New York, New York.

As such, this Court has original jurisdiction pursuant to 28 U.S.C. § 1332 to decide this controversy.

On January 26, 2023, I enclosed copies of the Notice of Removal to Plaintiffs' counsel, together with the copy of the foregoing Notice, in an envelope addressed to Plaintiffs' counsel, at his address, duly sealed, stamped, addressed, and deposited in the U.S. Mail at Atlanta, Georgia, for transmission to the same address on the date aforesaid.

FURTHER AFFIANT SAYETH NOT.



Andrew T. Craft, Esq.

SUBSCRIBED and SWORN to
before me this 26th day of January, 2023.

Kerri M. Coakley
Notary Public in and for the State of Georgia

My Commission Expires: 12/11/2024

